

1 JASON M. FRIERSON
United States Attorney
2 Nevada Bar Number 7709
ERIC SCHMALE
3 Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
4 Las Vegas, Nevada 89101
Telephone: (702) 388-6336
5 Email: eric.schmale@usdoj.gov

6 DEBORAH CONNOR
7 Chief, Money Laundering and Asset Recovery Section
8 Criminal Division, U.S. Department of Justice
D. ZACHARY ADAMS
Trial Attorney
1400 New York Ave NW
Washington, D.C. 20005
Telephone: (202) 514-1263
Email: david.zachary.adams@usdoj.gov

11 | *Attorneys for the United States*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

Case No. 2:22-cr-00142-RFB-DJA

15 Plaintiff,

Stipulation for Protective Order

16 | v.

17 | MEEAAD DEZFOOLI,

Defendant.

20 The parties, by and through the undersigned, respectfully request and stipulate that
21 the Court issue an order protecting from disclosure to the public any documents,
22 recordings, or other tangible things produced by the government during discovery that
23 contain the confidential personal identifying information and/or federal taxpayer
24 information of third parties referenced in the discovery. The parties state as follows:

1 1. On June 22, 2022, a federal grand jury indicted defendant MEELED
2 DEZFOOLI in an eight-count sealed indictment, alleging Bank Fraud in violation of 18
3 U.S.C. § 1344(2), Concealment Money Laundering in violation of 18 U.S.C. §
4 1956(a)(1)(B)(i)), and Monetary Transactions in Criminally Derived Property in violation
5 of 18 U.S.C. § 1957. ECF No. 1. On July 11, 2022, defendant Dezfooli made his initial
6 appearance and plea and was arraigned in the District of Nevada. ECF No. 6.

7 2. Trial is currently scheduled for September 12, 2022. ECF No. 6. The Federal
8 Public Defender appeared on behalf of the defendant on July 25, 2022. ECF No. 26.

9 3. The discovery to be produced in connection with this case contains extensive
10 personal identifying information of third parties, including names, addresses, and bank
11 account information. The release of such information to the public could endanger the
12 privacy of dozens of individuals and also subject them to potential misuse of their
13 identities.

14 4. The discovery to be produced in connection with this case also contains
15 confidential federal taxpayer information provided by the Internal Revenue Service in
16 accordance with 26 U.S.C. § 6103(i)(2) and being produced in discovery pursuant to 26
17 U.S.C. § 6103(i)(4)(B).

18 5. The confidential third-party personal identifying information and any
19 confidential third-party federal taxpayer information identified in paragraphs 3 and 4,
20 above, is referred to here as the “Protected Information.”

21 6. In order to protect the privacy of the third parties referenced in the discovery,
22 the parties intend to restrict access to Protected Information provided to the defense in
23 discovery to the following individuals: attorneys for the defendant, and any personnel that
24 the attorneys for the defendant consider necessary to assist in performing that attorney's

1 duties in the defense of this case, including investigators, paralegals, retained experts,
2 support staff, interpreters, and any other individuals specifically authorized by the Court
3 (collectively, the “Covered Individuals”).

4 7. The Covered Individuals shall be advised of the Protective Order, and,
5 without leave of Court, the Covered Individuals shall not:

- 6 a. use the Protected Information for any purpose other than preparing to
7 defend against the violations in the Indictment, or any superseding
8 indictment or further charges arising out of this case;
- 9 b. provide Protected Information to the custody and control of
10 individuals other than Covered Individuals; or
- 11 c. publicize any Protected Information, including by attaching any
12 Protected Information to any of the pleadings, briefs, or other court
13 filings except to the extent those pleadings, briefs, or filings are filed
14 under seal or properly compliant with LR IC 6-1.

15 8. The defendant shall only be permitted to review the Protected Information in
16 the presence of defense counsel who shall retain exclusive possession of the Protected
17 Information. Defense counsel will ensure that any discovery item left with Defendant is
18 fully redacted of any Protected Information.

19 9. Nothing in this stipulation is intended to restrict the parties’ use or
20 introduction of the Protected Information as evidence at trial or support in motion practice,
21 so long as the information is placed under seal or appropriate redactions are made in
22 accordance with LR IC 6-1.

23 10. The defense shall inform any person to whom disclosure may be made
24 pursuant to this order of the existence and terms of this Court’s order.

1 11. The parties reserve the right to seek to modify the terms of this protective
2 order at a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a
3 reasonable need for this protective order cease to exist, on grounds other than a Covered
4 Individual or some other person violating or circumventing its terms, the Government will
5 move expeditiously for its dissolution.

6 12. In the event of an inadvertent disclosure of the Protected Information, the
7 party making or learning of the inadvertent disclosure will immediately:

- a. Notify the person to whom the disclosure was made that it contains Protected Information subject to a Protective Order;
 - b. Make all reasonable efforts to preclude dissemination or use of the Protected Information by the person to whom disclosure was inadvertently made;

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1 c. Notify the Government and other parties of the identity of the person
2 to whom the disclosure was made, the circumstances surrounding the
3 disclosure, and the steps taken to ensure against further dissemination
4 or use of the information; and

5
6 Respectfully submitted,

7 For the United States:

8 JASON M. FRIERSON
9 Acting United States Attorney

10 /s/ Eric Schmale
11 ERIC SCHMALE
12 Assistant United States Attorney
D. Zachary Adams
Trial Attorney

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14 For the Defense:

15 /s/ Brian Pugh
16 BRIAN PUGH
17 Assistant Federal Public Defender
18 Attorney for DEFENDANT
DEZFOOLI

19 IT IS SO ORDERED:

20 

21 _____
22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE

24 August 16, 2022

Date